

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT CINCINNATI**

**GERALD L. SHULTS, JR.**

**: No. 1:20-cv-224**

**Plaintiff,**

**Judge Timothy Black**

**v.**

**:**

**SANDRA NORLING**

**:** Magistrate Judge Stephanie K.  
Bowman

**Defendant.**

**:**

[formerly in the Common Pleas Court of  
Clermont County, Ohio No. 2020 CVC  
00208]

---

**STIPULATION TO STAY ORDER ON MOTION FOR EXTENTION OF TIME**

---

Now come the parties in the above captioned case, by and through their respective counsels, and stipulate to their agreement to Stay the Order on Motion for Extension of Time entered on June 26, 2020. The parties wish to attend a settlement conference with the Court under Fed. R. Civ. P. 16(c) and S.D. Ohio Civ. R 16.3. Plaintiff hereby reserves the right to amend his complaint until a reasonable time after settlement conference or mediation.

Shults v. Norling  
Case Number: No. 1:20-cv-224

Stipulation to Stay

Respectfully submitted,

/s/ Mark C. Eppley  
Mark C. Eppley (#0079218)  
Andrew W. Green (#0072978)  
Attorneys for Plaintiff, Gerald L. Shults, Jr.  
EPPLEY LEGAL GROUP  
635 West Seventh Street, Suite 300  
Cincinnati, Ohio 45203  
(513) 621-6275  
(513) 621-6274 Facsimile  
mark@eppleylegalgroup.com  
andrew@eppleylegalgroup.com

/s/ Jennifer L. Wilson  
Jennifer L. Wilson (0071376)  
FREUND, FREEZE & ARNOLD  
Capitol Square Office Building  
65 E. State Street, Suite 800  
Columbus, OH 43215-4247  
T: 614-827-7300  
F: 614-827-7303  
jwilson@ffalaw.com  
Counsel for Defendant Sandra Norling

/s/ Edward J. Collins  
Edward J. Collins (0025833)  
DRODER & MILLER CO., LPA  
250 East Fifth Street Suite 700  
Cincinnati, OH 45202  
T: 513-721-1504 ext. 206  
F: 513-721-0310  
ecollins@drodermiller.com  
Co-Counsel for Defendant Sandra Norling

Shults v. Norling  
Case Number: No. 1:20-cv-224

Stipulation to Stay

/s/ Nicole Allbritain Mitchell

Nicole Allbritain Mitchell  
Freund Freeze & Arnold  
105 E. Fourth Street  
Suite 1400  
Cincinnati, OH 45202  
513-665-3500  
513-665-3503 (fax)  
nmitchel@ffalaw.com  
Counsel for Defendant Sandra Norling

/s/ John Mark Williams

John Mark Williams  
Law Office of John Mark Williams  
8549 Montgomery Road  
Cincinnati, OH 45236  
513-791-7919  
513-792-2175 (fax)  
jmwilliams@jmwilliamslaw.com  
Counsel for Defendant Sandra Norling

/s/ Bradley Allen Powell

Bradley Allen Powell  
Droder & Miller Co., LPA - 1  
250 East Fifth Street  
Suite 700  
Cincinnati, OH 45202  
513-721-1504 ext. 201  
513-721-1504 (fax)  
pbiltz@drodermiller.com

Attorneys for Defendant signed by email  
authorization 8/24/2020